

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

.....
IN RE: : **CASE NO. 5-18-04529-RNO**
MICHAEL C. BOYLE : **CHAPTER 13**
Debtor :
.....

**DEBTOR'S ANSWER TO THE MOTION OF
FOR RELIEF FROM THE AUTOMATIC STAY UNDER §362**

Debtor, Michael C. Boyle, through his undersigned counsel, hereby responds to the Motion for Relief from the Automatic Stay filed by Credit Acceptance as follows:

1. Admitted.
2. Denied. Strict proof of the averments are required at the time of trial.
3. Denied. Strict proof of the averments are required at the time of trial.
4. Denied. Strict proof of the averments are required at the time of trial.
5. Denied. The Debtor has been making payments throughout the duration

of his bankruptcy. However, he mistakenly had been making only a partial payment every month. The Debtor would like to enter into a stipulation to cure the post-petition arrearage. Strict proof of the averments are required at the time of trial.

WHEREFORE, the Debtor respectfully requests that this Honorable Court enter an Order denying the Relief requested by Credit Acceptance and for such other and further relief is just and appropriate.

Respectfully submitted,

CONWAY LAW OFFICES, P. C.

/s/ Mark J. Conway
MARK J. CONWAY (ID #59114)
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Phone (570) 343-5350
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Attorney for Debtor

DATED: February 25, 2021

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CERTIFICATE OF SERVICE

I, Amy L. Marta, Paralegal hereby certify that I caused a true and correct copy of the foregoing Answer to the Motion for Relief From Automatic Stay Under §362 to be served via e-mail to the following:

Charles J. DeHart, III
Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
dehartstaff@pAMD13trustee.com

William E. Craig, Esquire
Morton & Craig, LLC
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CONWAY LAW OFFICES, P.C.

/s/ Amy L. Marta _____
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DATED: February 25, 2021